

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

ELLENOR ZINSKI,)	
)	
Plaintiff,)	
)	
v.)	Case No. <u>6:24-cv-41-NKM</u>
)	
LIBERTY UNIVERSITY, INC.,)	
)	
Defendant.)	

**DEFENDANT LIBERTY UNIVERSITY’S MOTION TO STAY DISCOVERY
PENDING RESOLUTION OF INTERLOCUTORY APPEAL**

Pursuant to Fed. R. Civ. P. 26(c)(1), W.D. Va. Civ. R. 11(c), and 28 U.S.C. §1292(b), Defendant, Liberty University, Inc. (“Liberty University”), hereby moves the Court to stay discovery pending resolution of its pending interlocutory appeal. Liberty University’s grounds for the requested relief are more fully set forth in the accompanying Memorandum of Law, filed simultaneously herewith.

Respectfully submitted,

/s/ Daniel J. Schmid

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CERTIFICATION PURSUANT TO FED. R. CIV. P. 26(c)(1)

I hereby certify that at the telephonic status conference held with Magistrate Judge C. Kailani Memmer, Plaintiff and Defendant conferred in good faith in an effort to resolve the dispute regarding a stay of discovery without seeking the Court's intervention. Plaintiff opposes the Motion to Stay Discovery, indicated the same to Defendant and the Court, which necessitated the filing of this motion.

/s/ Daniel J. Schmid
Daniel J. Schmid

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of March, 2025, I caused a true and correct copy of the foregoing to be electronically filed with this Court. Service will be effectuated on all counsel of record via this Court's ECF/electronic notification system.

/s/ Daniel J. Schmid
Daniel J. Schmid